m/047/013

McKeachnie, Allred, McClellan & Trotter, P.C.
Attorneys, Mediators, and Counselors

Gayle F. McKeachnie
Clark B. Allred
Clark A. McClellan
Donna M. Trotter

Offices in Vernal & Roosevelt

121 West Main Street
Vernal, Utah 84078
Phone: (435) 789-4908
Fax: (435) 789-4918
E-mail: mca@ubtanet.com

72 North 300 East (123-14)
Roosevelt, Utah 84066
Phone: (435) 722-3928
Fax: (435) 722-3920
E-mail: clarks@ubtanet.com

Reply to:
Vernal Office

CBNV-1
AMENDMENT

August 11, 2000

RECEIVED
SEP 19 2000
DIV. OF OIL, GAS & MINING

MR. DOUGLAS M. KOZA
DEPUTY STATE DIRECTOR
US BUREAU OF LAND MANAGEMENT
P.O. BOX 45155
SALT LAKE CITY UTAH 84145-0155

RE: Additional information to Mining plan for the Cowboy Vein for Gilsonite on Lease U-0115850

Dear Mr. Koza:

Ziegler Chemical and Mineral Corporation (ZCMC) hereby submits the following information for approval to be included in the Cowboy Mine Plan:

1. Description of the Affected Lands.

A. Vegetative Cover - The area surrounding the proposed mine shaft consists of barren hills and dry washes, sparsely vegetated with desert shrub type vegetation. Density of vegetation varies significantly depending on the local environment. In general, ground cover is sparse, approximately 20 percent. The dominant vegetation is an association of salt-tolerant, low-growing shrubs including, shadscale, horsebrush, four-wing salt bush, greasewood, black sage, rabbitbrush, big sage and Nuttall salt bush. Grasses found include Indian ricegrass, needle and thread, cheatgrass and galleta.

B. Climate and Air Quality - The area is generally too dry to support the growth of any significant quantities of grass or other feed type vegetation, consequently there is minimal feed and animal life present in the area.

C. Indigenous wildlife - Wildlife which are occasionally present in the area include rabbits, coyotes, antelope, birds and mule deer.

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL # of pages ▶

To Doug Jensen	From STAN Perkes
Dept./Agency	Phone # 539-4036
Fax # 359-3940	Fax # 539-4200

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

D. Past and Present Land Use - There are presently a number of old abandoned gilsonite shafts existing along the vein in the general vicinity of the proposed new mining operations. Utah Highway 45 bisects the claim area which is the subject of this mining plan. There is some oil and gas drilling activity and gilsonite mining activity in the general vicinity of the proposed new mineshafts. Other than mining and oil and gas activity there are no other known uses of or activity on the land in the immediate vicinity of the proposed operations.

E & F. Surface and Ground Waters - The land form of the area reflects the geology and arid climate. The area is drained by a system of small, intermittent washes which flow toward the southwest joining with the larger Coyote Wash. This "Dry Wash" system eventually empties into the White River. This area does not contain rivers or other significant bodies of perennial water. The average precipitation in the area is probably less than 10 inches per year. Because of the existing low precipitation and correspondingly low recharge, significant near-surface occurrence of ground water are probably rare.

G. Soils and Subsoils - Due to the diversity of the terrain and the arid climate, soil distribution in the area varies greatly. Along the hillsides wind and rain erosion have swept away the soil/subsoil layers exposing the underlying geology in many places. The soil/subsoil layers where present on the hillside occur at various depths from minute to several inches. The greatest depth occurring in the dry wash bottoms were the alluvium have been deposited.

H. Cultural and Archaeological features - Ziegler Chemical has contracted with TRC Mariah Associates of Laramie, Wyoming to conduct a Class III Cultural Resource Inventory of this area. They will also make an Environmental Assessment as well. These two documents will be made available to the Bureau for review.

2. Dust Control.

Elimination of fugitive dust during the truck loading process will be accomplished by the following means. The ore haulage

trucks are equipped with metal covers having hatches that open to facilitate the loading of product. The bottom of the ore storage bin at the mine site will have down spouts that extend into the open hatches of the ore trucks. Allowing the mined product to pass from the storage bin into the truck without being influenced by air movement from outside sources. During the loading process a four (4) inch flexible vacuum hose will be connected into the top of the truck cover to provide pressure relief. It will also aid in the containment of any fugitive dust by preventing emissions of dust from the truck during the loading of ore. This four (4) inch vacuum line will also be used, in the unlikely event that there is spillage, to clean-up under the storage bin. This hose will be connected to the Micro-Pul dust collector located on the top of the ore storage bin. In addition a partition will be constructed around three (3) sides of the ore storage bin to help prevent wind from blowing Gilsonite dust while being loaded into the trucks.

Ore that is taken from the mine during normal mining operations, including shaft sinking, will go into a Micro-Pul dust collector. From the dust collector it will go through a rotary valve directly into the ore storage bin. This contained system will not allow fugitive dust to escape into the environment.

3. Declaration Statement about Hazardous Materials.

Less than 10,000 pounds of any chemical(s) from EPA's Consolidated List of Chemicals Subject to Reporting Under Title III of the Superfund Amendments and Reauthorization Act (SARA) of 1986 and less than the Threshold Planning Quantity (TPQ) of any extremely hazardous substance(s), as defined in 40 CFR 355, would be used, produced, transported, stored, disposed, or associated with the proposed placer processing operations annually. Vehicle and equipment fuel, lubricants, antifreeze and battery acid would be the only hazardous materials used or associated with the proposed action. Risk of a release would be very low, and the adverse environmental affect of release would be minimal because it would be cleaned up immediately and disposed of in an approved waste disposal facility.

4. Additional Information Regarding Mine Plan.

In conjunction with this mine plan ZCMC would like to drill at least two exploratory holes. The first to be at the location of the CNV #1 shaft. This will help to determine the location of the mine collar and possible depth of the north vein itself. The second drill hole will be in the shaft of the old C4 mine located on the south vein. Drilling in this old shaft will help us in locating the necessary escape route for the mining operations that will be conducted on the south vein. It will also help us to determine the depth of the ore in this vein. Both holes will be drilled to a depth of 1,000 feet. The holes will be drilled by Ziegler Chemicals Ingersoll-Rand 660 drill rig. Since the holes are to be air drilled there will be no water used in the drilling operation. Because these holes will be drilled in the Gilsonite vein where ZCMC will be sinking shafts for mining and escapeways, their will be no need to plug these holes.

Very truly yours,

McKEACHNIE, ALLRED,
McCLELLAN & TROTTER, P.C.

By: Gayle McKeachnie
Gayle McKeachnie

GFM/sm
cc:Gordon Ziegler
Stan Wagner